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6 Attorneys for Plaintiff
7 United States of America

8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10 11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ANTHONY RODRIGUEZ,

15 Defendant.

CASE NO. 1:20-CR-00236-NONE

16 STIPULATION TO CONTINUE SENTENCING
17 DATE; ORDER

18 DATE: December 17, 2021

19 TIME: 8:30 a.m.

COURT: Hon. Dale A. Drozd

17 STIPULATION

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
19 through defendant's counsel of record, hereby stipulate as follows:

20 1. By previous order, this matter was set for sentencing on December 17, 2021.

21 2. By this stipulation, defendant now moves to continue the sentencing until January 12,
22 2022. As this is a sentencing and a change of plea has already been entered, no exclusion of time under
23 the Speedy Trial Act is required.

24 3. The parties agree and stipulate, and request that the Court find the following:

25 a) The government has represented that the discovery associated with this case
26 includes voluminous jail phone calls, as well as additional electronic evidence only recently
27 discovered as part of a different related investigation. All of this discovery has been either
28 produced directly to counsel and/or made available for inspection and copying.

b) Counsel for defendant wishes for sentencing to occur in-person. The realities of the COVID-19 pandemic and the participants' holiday schedules mean that an in-person sentencing cannot occur before January 12, 2022.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

IT IS SO STIPULATED.

Dated: October 27, 2021

PHILLIP A. TALBERT
Acting United States Attorney

/s/ LAURA D. WITHERS
LAURA D. WITHERS
Assistant United States Attorney

Dated: October 27, 2021

/s/ MEGHAN D. McLOUGHLIN
MEGHAN D. McLOUGHLIN
Counsel for Defendant
ANTHONY RODRIGUEZ

FINDINGS AND ORDER

IT IS SO ORDERED.

Dated: **November 8, 2021**

Dale A. Droyd
UNITED STATES DISTRICT JUDGE